

**Judge John C. Coughenour**  
**Judge Michelle L. Peterson**

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

GUILD MORTGAGE COMPANY LLC,

Plaintiff,

vs.

CROSSCOUNTRY MORTGAGE LLC,

Defendant.

No. 2:21-cv-01376-JCC-MLP

STIPULATED MOTION TO AMEND  
BRIEFING SCHEDULES RELATED TO  
PLAINTIFF'S MOTION FOR SANCTIONS  
AGAINST DEFENDANT

Noted for Consideration  
9/13/2022

I. INTRODUCTION AND RELIEF REQUESTED

Plaintiff Guild Mortgage Company LLC ("Guild"), and Defendant CrossCountry Mortgage LLC ("CrossCountry") (collectively the "Parties"), by and through their respective counsel of record, hereby stipulate and agree to the following:

On September 5, 2022, Guild filed a Conditional Non-Opposition to Cross-Country's Renewed Motion to Dismiss, in which Guild requested the Court to retain jurisdiction to consider a motion for sanctions against CrossCountry. [Dkt. No. 116.] On September 9, 2022, Guild filed its Motion for Sanctions Against CrossCountry. [Dkt. No. 117.]

CrossCountry has requested discovery related to the allegations and arguments made by Guild in its Motion for Sanctions. The parties met and conferred regarding Guild's responses to

1 those requests, and Guild provided substantive responses and intends to produce a witness for a  
2 30(b)(6) deposition on September 15, 2022.

3 Based on the timing of this discovery, the parties also met and conferred regarding the  
4 briefing schedule for Guild's Motion for Sanctions. The Parties reached an agreement that Guild  
5 would note its Motion for Sanctions for October 14, 2022. The parties also agreed to request the  
6 following amended briefing schedule: (1) CrossCountry's Opposition to be due on October 3,  
7 2022; and (2) Guild's reply in support of its motion to be due on October 11, 2022.

## 8 II. EVIDENCE RELIED UPON

9 This stipulated motion relies upon the joint statements made herein and documents filed  
10 with the Court in this action.

## 11 III. STATEMENT OF FACTS

12 As detailed in the Introduction, counsel for the Parties have conferred and agreed that it  
13 would be in the best interest of the Parties and the Court to amend the briefing schedule as  
14 described above. Because they have agreed on a noting date further in the future than the third  
15 Friday from the filing date, the Parties are proposing earlier deadlines for the opposition and  
16 reply than are required by LCR(d)(3). Pursuant to LCR 7(d)(3), the opposition would be due  
17 October 11, 2022,<sup>1</sup> and the reply would be due on October 14, 2022. Amending these deadlines  
18 will allow CrossCountry a reasonable opportunity to review Guild's revised discovery responses,  
19 complete the scheduled 30(b)(6) deposition on September 15, 2022, and prepare its opposition to  
20 Guild's Motion for Sanctions; and will also allow Guild a reasonable time to prepare its reply  
21 brief. At the same time, setting these deadlines earlier than the normal briefing schedule will  
22 provide this Court with additional time to review these submissions before the noting date.

## 23 IV. AUTHORITY

24 The Court has authority under Rule 6(b), Federal Rules of Civil Procedure, to extend  
25 deadlines. This Court also has inherent power to manage its calendar. *E.g., Brenner v. VIZIO,*  
26 *Inc.*, No. 3:17-cv-05897-BHS, 2018 U.S. Dist. LEXIS 189306, at \*3 (W.D. Wash. Nov. 5, 2018).

27 <sup>1</sup>October 10, 2022 is a Court holiday.

In this case, good cause exists to amend the briefing schedule for the convenience of the Court and the Parties.

### V. CONCLUSION

NOW, THEREFORE, the Parties jointly request that this Court should amend the briefing schedule related to Guild's Motion for Sanctions as follows:

1. The deadline for CrossCountry to file and serve its Opposition to Guild's Motion for Sanctions shall be October 3, 2022; and

2. The deadline for Guild to file and serve its Reply in Support of its Motion for Sanctions shall be October 11, 2022.

DATED: September 13, 2022

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**DECLARATION OF SERVICE**

I hereby certify that on September 13, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

***Counsel for Plaintiff Guild Mortgage Company LLC***

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Dated: September 13, 2022 at Seattle, Washington.

*s/Hilton Platt*

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